

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

PENNSYLVANIA ACADEMY OF MUSIC  
Debtor

Case No. 10-14377

Chapter 11

**MOTION FOR EXTENSION OF TIME OF THE EXCLUSIVITY PERIOD FOR  
DEBTOR TO FILE PLAN AND TO SECURE ACCEPTANCE  
OF A PLAN UNDER SECTION 1121 (b and c) OF THE BANKRUPTCY CODE**

Debtor files this Motion to Extend Time of the Exclusivity Period for it to File a Plan and secure acceptance thereof and in support of same alleges the following:

1. Debtor filed for relief under Chapter 11 on May 27, 2010, and has since that date remained in possession of its property.
2. Debtor as Debtor-in-Possession has continued to operate its business since the filing and has timely filed its schedules, statement of affairs and monthly operating statements.
3. Debtor has stabilized its operation, reduced its operational costs, retained its faculty, relocated the school, conducted summer instructions as well as conducted its annual Vivace Festival, and will begin the fall academic term on September 1, 2010.
4. Debtor continues to explore options for proposing a Plan to continue the operation of the Academy as a school, including infusion of funds by collecting delinquent pledges, a capital campaign, obtaining grants from public and private foundations, liquidation of surplus assets, etc.
5. This Court recently fixed a Bar Date of October 8, 2010, for the filing of claims. Until the Bar Date has passed it is difficult to determine the exact amount of creditor claims as the books of the Debtor have not been audited or closed for more than 2 years. Until all Proofs of Claim have been filed, Debtor is unable to accurately determine the total amount of secured, priority, or unsecured claims to propose a Plan, a Disclosure Statement and seek acceptance.

6. Debtor will need some additional brief period of time beyond the Bar Date to examine all claims filed, then determine the Chapter 11 Plan to propose, draft a Plan, prepare and file a Disclosure Statement, and after Court approval of the Disclosure Statement, seek creditor approval.

7. Debtor avers that it is in the best interest of Debtor, its estate, and its creditors to extend the exclusive period of time for Debtor to file a Plan and to seek acceptance of same from creditors.

WHEREFORE, Debtor moves your Honorable Court to extend the exclusive period of time for it to file its plan for a period of one hundred twenty (120) additional days.

Date: August 31, 2010

JACQUES H. GEISENBERGER, JR., P. C.

By: /s/ Jacques H. Geisenberger, Jr.

Jacques H. Geisenberger, Jr.

I.D. No. 06947

Attorney for Debtor

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